

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

STEVEN G. MILLETT, MELODY J.	)	
MILLETT, On Behalf of	)	
Themselves and All Others	)	
Similarly Situated,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. 05-599-SLR
	)	
TRUELINK, INC., a Trans Union	)	
Company,	)	
	)	
Defendant.	)	

VIDEOTAPED DEPOSITION OF LUCY DUNI

Taken on behalf of Plaintiff

March 28, 2007

Reported by Roselind C. Pisano, CSR

Illinois License No. 084-002031

1 knowing that, right now, your credit report is being  
2 monitored for changes." And then, you know, it  
3 details the changes.

4 So that's how it helps you to stay on top  
5 of your credit, by informing you of critical  
6 changes.

7 Q. If a consumer were not notified -- strike  
8 that.

9 In what way does the Credit Monitoring  
10 service guard against identity theft?

11 A. It also details, you know, details it --  
12 it's in the same way. It notifies you of critical  
13 changes to your credit report.

14 Q. What is a critical change?

15 A. Some examples here are new inquiries,  
16 address changes, new accounts opened in your name.  
17 And then those are what we were talking about  
18 earlier, those critical changes.

19 Q. And why are those items selected as a  
20 critical change?

21 A. Those are the -- we use a TransUnion watch  
22 to -- and that's what it watches for. So that's how  
23 they were selected.

24 Q. Could you increase the number of items  
25 which would be monitored for changes?

1 A. No.

2 Q. And why not?

3 A. Well because we're using that watch product  
4 and those are the items that it watches for. We're  
5 dependent on that product.

6 Q. There's a reference in the next paragraph  
7 to Credit Specialists. Why are there -- why is the  
8 word Credit Specialist capitalized?

9 A. As a title.

10 Q. And what is that intended to convey? Who  
11 is a Credit Specialist?

12 A. Our -- we refer to our customer service  
13 specialists as Credit Specialists because they've  
14 gone through certain training and they're trained to  
15 answer questions.

16 Q. Who provides that training?

17 A. I don't know the name of the certification  
18 off the top of my head.

19 Q. There is a certification process?

20 A. Uh-huh, yes.

21 Q. I think you referred to this as a receipt,  
22 did you not?

23 A. Yes.

24 Q. Does the appearance of a receipt change  
25 over the course of time?

1 Q. Has the time period for providing the alert  
2 always been 24 hours?

3 A. No.

4 Q. Is the time period for the 24 hour alert  
5 the time period in existence today?

6 A. Yes.

7 Q. And what was the time period in 2005?

8 A. Well it was -- previously it was weekly,  
9 but I don't remember when we changed from weekly to  
10 daily.

11 Q. Has it ever been less frequently than  
12 weekly?

13 A. No.

14 Q. So even though a subscriber elected to  
15 receive their all clear notifications on a monthly  
16 basis, they would still be alerted within 24 hours  
17 of a key change?

18 A. Yes.

19 Q. And who determines whether or not a key  
20 change has been made?

21 A. The credit bureaus report on the change to  
22 us and then we pass that on to the customer.

23 Q. And you pass the alert on to a customer  
24 through their e-mail?

25 A. Yes.